

ALLMAND AND LEE PLLC  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE: )  
JOSE FELIX PEREZ )  
EVELIA A MORAN-PEREZ )  
DEBTORS )

CASE NO.: 09-47247-DML  
CHAPTER 13  
  
JUDGE DENNIS MICHAEL LYNN

**DEBTORS' MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION**

DATE: 1/26/2011

Pursuant to 11 USC § 1329, the Debtors request the following modification(s) to the Debtors' original or last modified Chapter 13 plan.

1. History of Case:

Petition Date:	11/15/2009	Total Paid In (Received to Date):	\$23,591.00
First Meeting Date:	12/23/2009	Amount Due to be Current:	\$ -
Confirmation Date	03/03/2010	Plan Base (Current):	\$ 105,300.00
		Plan Base (New)	\$ 71,799.00

2. Current Plan Payment to Trustee Amounts and Term:

Start Date	Number Periods	Amount	How Often
12/15/2009	10	\$1,750.00	MONTHLY
10/15/2010	50	\$1,756.00	

3. New Plan Payment to Trustee Amounts and Term:

Start Date	Number Periods	Amount	How Often
02/15/2011	46	\$1,048.00	MONTHLY

Debtors' new payment will be on or before: 02/15/2011

NEW PLAN BASE: \$71,799.00

Debtors new payment Start Date may not be more than 30 days from the above date, BUT ANY INCREASE OR DECREASE IN Debtors new payment amount may not be less than 30 days from the above date.

4. PROVIDE FOR OR MODIFY TREATMENT OF SECURED CLAIMS (CRAM DOWN) TO:

\*\*\* NONE \*\*\*

The automatic stay shall be lifted and the Trustee shall cease disbursement of account of any Surr (surrender) of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2010-01, Paragraph 4e.

5. PROVIDE FOR OR MODIFY TREATMENT OF SECURED CLAIMS (NO CRAM DOWN) TO:

**Modify to Surrender 2008 Yamaha to HSBC, claim \$13,782.62 (value \$13,863.74). Modify to Surrender 2007 Nissan Pathfinder to Nissan Acceptance, claim \$20,359.46 (value \$23,700).**

The automatic stay shall be lifted and the Trustee shall cease disbursement of account of any Surr (surrender) of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2010-01, Paragraph 4e.

6. PROVIDE FOR OR MODIFY TREATMENT OF PRIORITY CLAIMS TO:

\*\*\* NONE \*\*\*

7. Reason for modifications or other plan provisions:

- (1) To Cure plan arrears to the Trustee.
- (2) To provide or modify treatment for Secured, Priority or Unsecured claims not previously provided for.

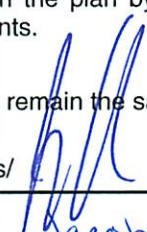
8. Debtors' attorney fee for this modification:

Total amount of \$400.00, of which \$400.00 will be paid through the plan by the Trustee pro rata, after payment of specified monthly payments and before any other pro rata payments.

9. All other provisions as set forth in the last confirmed plan remain the same.

Date: 1/26/2011

/s/

  
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Jacob Decker  
TX, Bar No. 24062693  
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8701 BEDFORD EULESS RD  
STE 510  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing DEBTORS MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION was served upon the Debtors and the parties listed below by or under the direction of the undersigned by US First Class Mail, postage paid, and electronically by the Clerk on the Trustee and all other parties entitled to electronic notice on the date of filing hereof.

Date: 1/26/2011

/s/

  
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Jacob Decker